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8 **UNITED STATES DISTRICT COURT**
9 **EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION**
10

11 METROPOLITAN LIFE INSURANCE
COMPANY, a New York corporation,

12 Plaintiff,

13 vs.

14 ACDF, LLC, a California limited liability
15 company, et al.,

16 Defendants.

Lead Case No. 1:24-cv-01261-KES-SAB

Consolidated with Case Nos:
1:24-cv-01226; 1:24-cv-01230; 1:24-cv-
01231; 1:24-cv-01232; 1:24-cv-01233; 1:24-
cv-01235; and 1:24-cv-01241

**STIPULATION AND [PROPOSED]
ORDER BETWEEN RECEIVER AND
MARICOPA DEFENDANTS TO EXTEND
TIME FOR FILING OF REPLIES IN
SUPPORT OF MOTION FOR
APPROVAL OF SALE PROCEDURES**

Hearing:

Judge: Hon. Kirk E. Sherriff

Date: March 10, 2025

Time: 1:30 p.m.

Crtrm.: Robert E. Coyle U.S. Courthouse
2500 Tulare Street
Courtroom 6, 7th Floor
Fresno, CA 93721

- 17 ☒ Affects All Cases
18 ☐ Affects Metropolitan Life Ins. Co. v.
19 ACDF, LLC, et al., 1:24-cv-01261
20 ☐ Affects Metropolitan Life Ins. Co. v.
FNF Farms, LLC, et al., 1:24-cv-01226
21 ☐ Affects Metropolitan Life Ins. Co. v. C
& A Farms, LLC, et al., 1:24-cv-01230
22 ☐ Affects Metropolitan Life Ins. Co. v.
Maricopa Orchards, LLC, et al., 1:24-
23 cv-01231
24 ☐ Affects Brighthouse Life Ins. Co. v.
Kamm South, LLC, et al., 1:24-cv-
25 01232
26 ☐ Affects Brighthouse Life Ins. Co. v.
Manning Avenue Pistachios, LLC, et
27 al., 1:24-cv-01233 Case No. 1:24-cv-
01233
28

- ☐ Affects Brighthouse Life Ins. Co. v. ACDF, LLC, et al., 1:24-cv-01235
- ☐ Affects MetLife Real Estate Lending, LLC v. Panoche Pistachios, LLC, et al., 1:24-cv-01241

Phillip Christensen, as Receiver (the “Receiver”), on the one hand, and the Maricopa Defendants (defined below), on the other hand, hereby stipulate as follows:

Background

1. On February 19, 2025, the Receiver filed the *Receiver’s Motion for Approval of Sale Procedures* (ECF No. 101) (the “Motion”).

2. The Court set the Motion for hearing on March 3, 2025, with oppositions due by February 26, 2025, and replies due by March 1, 2025.

3. The *Statement of Position in Response to Ex Parte Application for Approval of Sales Procedures* (ECF No. 106) (the “Statement”) was filed by the Maricopa Defendants (who are named and defined in the Statement).

4. On February 27, 2025, the Court *sua sponte* continued the hearing on the Motion to March 10, 2025.

5. The Receiver and the Maricopa Defendants have ongoing discussions relating to the Receiver’s Motion and the Maricopa Defendants’ Statement.

6. In light of these facts, the Receiver and Maricopa Defendants agree that the deadline for parties to file replies to the Statement should be extended from March 1, 2025 to March 6, 2025 at 4:00 p.m.

Stipulation

1. Subject to the Court's approval, the Receiver and Maricopa Defendants, through their undersigned counsel, agree that the deadline for the Receiver and other parties to file replies to the Statement is extended, from March 1, 2025, to March 6, 2025 at 4:00 p.m.

DATED: March 3, 2025

SAUL EWING LLP

By:



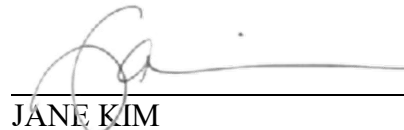
ZEV SHECHTMAN

Attorneys for Phillip Christensen, as Receiver

DATED: March 3, 2025

KELLER BENVENUTTI KIM LLP

By:



JANE KIM

Attorneys for Maricopa Defendants

IT IS SO ORDERED.

Dated March __, 2025

UNITED STATES DISTRICT JUDGE

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this case. My business address is: **Saul Ewing 1888 Century Park East, Suite 1500, Los Angeles, CA 90067.**

A true and correct copy of the document entitled: **Stipulation and [Proposed] Order Between Receiver and Maricopa Defendants to Extend Time for Filing of Replies in Support of Motion for Approval of Sale Procedures** will be served or was served on the judge in chambers in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING

(NEF): The foregoing document will be served by the court via NEF and hyperlink to the document. On **March 3, 2025**, I checked the CM/ECF docket for this case and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On **March 3, 2025**, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed

☒ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served):

Pursuant to F.R.Civ.P. 5 on **March 3, 2025**, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

☒ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

March 3, 2025	Hannah Richmond	/s/ Hannah Richmond
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

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1 **3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE**
2 **TRANSMISSION OR EMAIL (continued) :**

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